

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

WILLIAM F. HASSAY, JR.,

Plaintiff,

v.

MAYOR AND CITY COUNCIL OF
OCEAN CITY, MARYLAND, *et al.*

Defendants.

Civil Action No. 1:13-cv-01076-ELH

* * * * *

**JOINT MOTION TO REOPEN CASE AND TO
ENTER PERMANENT INJUNCTION**

Plaintiff William F. Hassay, Jr., by his undersigned attorneys, and Defendants Mayor and City Council of Ocean City and Michael Colbert in his official capacity as Acting Chief of Police for the Town of Ocean City at the time suit was filed, by their undersigned counsel, jointly move to reopen this matter for the limited purpose of allowing the Court to convert it's July 3, 2013 Preliminary Injunction (EFC 40) into a Permanent Injunction, in order to facilitate the parties' settlement of the action.

As cause therefore, the parties submit that they have reached a settlement in this matter, one element of which is that the Court's July 3 Preliminary Injunction shall be made permanent. Accordingly, and in order to effectuate this provision of the settlement, the parties request that the case be reopened and a Permanent Injunction issued.

A Proposed Order accompanies this Motion.

Respectfully submitted,

/s/

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